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9
10 **UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF NEVADA**

13 COLLEGIUM FUND SERIES 32, a Nevada
14 limited-liability company,

15 v.
16 Plaintiff,

17 MARK DANIEL SNYDER, an individual;
18 WELL'S FARGO BANK, N.A.; DOES I
THROUGH X; and ROE
CORPORATIONS 1 THROUGH 10,

19 Defendants.

20 Case No.: 2:16-cv-01640-JCM-PAL

21 **STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
FEDERAL HOME LOAN
MORTGAGE CORPORATION'S
MOTION FOR SUMMARY
JUDGMENT**

22 **(SECOND REQUEST)**

23 WELL'S FARGO BANK, N.A., a national
banking association,

24 v.
25 Counter-Claimants,

26 COLLEGIUM FUND SERIES 32, a Nevada
limited-liability company, ABSOLUTE
COLLECTION SERVICES, LLC, a Nevada
limited liability company; NUEVO VISTA
HOMEOWNERS ASSOCIATION, INC., a
Nevada non-profit cooperative corporation,

27 Counter-Defendants.

1 FEDERAL HOME LOAN MORTGAGE
2 CORPORATION,

3 Counter-Claimants,

4 v.

5 COLLEGIUM FUND SERIES 32, a Nevada
6 limited-liability company, ABSOLUTE
7 COLLECTION SERVICES, LLC, a Nevada
8 limited liability company; NUEVO VISTA
9 HOMEOWNERS ASSOCIATION, INC., a
Nevada non-profit cooperative corporation,

10 Counter-Defendants.

11 Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation
12 (“Freddie Mac”), Collegium Fund Series 32 (“Collegium Fund”), Absolute Collection Services, LLC
13 (“ACS”), and Nuevo Vista Homeowners Association, Inc. (the “HOA”), by and through their
14 respective counsel, hereby respectfully request that the Court enter an order, pursuant to Local Rules
15 6-1 and 7-1, extending the time for Collegium Fund, ACS, and the HOA to respond to the Motion
16 for Summary Judgment (the “MSJ”) filed by Freddie Mac on January 17, 2017 [ECF No. 26] and
17 joined by Wells Fargo on January 20, 2017 [ECF No. 29]. The response to the MSJ is currently due
18 on March 7, 2017. The Parties have agreed to extend this response date to March 28, 2017.

19 The extension is being sought in good faith and will not unduly delay this litigation. Freddie
20 Mac has recently discovered additional documents that may be responsive to Collegium Fund’s
21 discovery requests. Freddie Mac is in the process of reviewing the documents for production.
Collegium Fund, the HOA, and ACS would like some time to review these additional documents
before responding to the MSJ.

22 Accordingly, the Parties respectfully request that the Court grant this Stipulation and extend
23 the time to respond to the MSJ from March 7, 2017 to March 28, 2017.

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1 DATED this 6th day of March, 2017.

2 CONNAGHAN|NEWBERRY

3 /s/ Paul Connaghan (with permission)

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5 Nevada Bar No. 3229

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8 7854 W. Sahara Avenue

9 Las Vegas, NV 89117

10 *Attorneys for Collegium #32*

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12 /s/ Nathan Kanute

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18 ABSOLUTE COLLECTION SERVICES, LLC

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20 /s/ Shane Cox (with permission)

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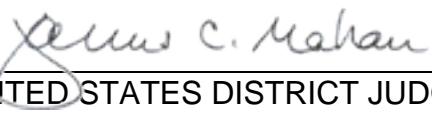
25 *Attorneys for Absolute Collection Services*

26 /s/ Elizabeth Lowell (with permission)

27 Elizabeth B. Lowell, Esq.

28 Nevada Bar No. 8551

1 IT IS SO ORDERED.

2 
3 UNITED STATES DISTRICT JUDGE

4 DATED: March 8, 2017

Snell & Wilmer

LLP
LAW OFFICES
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Reno, Nevada 89501
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CERTIFICATE OF SERVICE

As an employee of Snell & Wilmer L.L.P., I certify that I served a copy of the foregoing
**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO FEDERAL HOME
LOAN MORTGAGE CORPORATION'S MOTION FOR SUMMARY JUDGMENT** on the 6th
day of March, 2017 by the method indicated:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada addressed as set forth below.
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- BY PERSONAL DELIVERY:** by causing personal delivery by _____, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

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/s/ Lara J. Taylor
An employee of Snell & Wilmer L.L.P.